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12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14

15 SHELLEY FREEMAN,

16 Plaintiff,

17 v.

18 WELLS FARGO & COMPANY, WELLS  
19 FARGO BANK, N.A.,

20 Defendants.  
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Case No. 4:23-cv-00476-DMR

**STIPULATION AND ORDER (AS  
MODIFIED) TO CONTINUE FURTHER  
CASE MANAGEMENT CONFERENCE**

The Hon. Donna M. Ryu

WHEREAS, on November 15, 2023, following the initial case management conference, the Court set a further case management conference for March 20, 2024 at 1:30 p.m. via videoconference and ordered that the Parties file an updated joint case management statement by March 13, 2024 (ECF No. 43);

WHEREAS, the Parties exchanged initial disclosures on January 5, 2024;

WHEREAS, the Parties are currently negotiating a stipulated protective order and an electronic discovery protocol that will govern the production of documents and electronically stored information;

WHEREAS, the Parties have conferred and agreed that the interests of judicial efficiency and economy would be best served by continuing the case management conference currently scheduled for March 20, to enable the Parties to agree upon a stipulated protective order, to be submitted for the Court's approval, and an electronic discovery protocol;

WHEREAS, the Parties do not have anything further to report to the Court at this stage, but have agreed that, in the event circumstances necessitate an earlier further case management conference, they will determine a mutually agreeable date for an earlier conference at the Court's availability;

WHEREAS, this stipulation is not a waiver of any Party's rights, remedies, claims or defenses;

IT IS ACCORDINGLY STIPULATED AND AGREED, by and between Plaintiff and Defendants, by and through their authorized attorneys, and subject to approval by the Court, as follows:

1. The further case management conference currently set for March 20, 2024 is continued to June 19, 2024 at 1:30 p.m., or a date thereafter that is convenient for the Court.

2. The Parties shall file an updated joint case management statement no later than 7 days prior to the further case management conference.

Dated: March 12, 2024

Respectfully submitted,

**SULLIVAN & CROMWELL LLP**

By: /s/ Diane L. McGimsey

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*Counsel for Plaintiff Shelley Freeman*

**Attestation Pursuant to Local Rule 5-1(i)(3)**

Pursuant to Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatory.

Dated: March 12, 2024

/s/ Diane L. McGimsey

Diane L. McGimsey

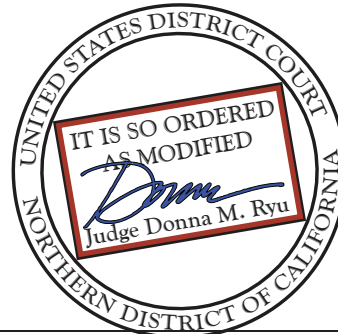
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**ORDER (AS MODIFIED)**

PURSUANT TO THE STIPULATION, IT IS SO ORDERED that the Further Case Management Conference set for March 20, 2024 at 1:30 p.m. is vacated and continued to July 17, 2024 at 1:30 p.m. in Oakland, by Videoconference only. Parties shall file an updated joint case management conference statement by July 10, 2024. All counsel and parties may access the webinar information (public hearings) at <https://cand.uscourts.gov/judges/ryu-donna-m-dmr/>.

IT IS SO ORDERED AS MODIFIED.

Date: March 14, 2024



Hon. Donna M. Ryu  
United States Chief Magistrate Judge